



December 16, 2004

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

JAN 24 2005

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, AdvoCare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road, Suite 134
Carrollton, TX 75006

Product Name: Volkov's V16

Statement(s)

Basis for Statement

Helps the body adapt to stress

Golden Root extract (root - Rhodiola rosea)
Leuzea extract (root - Rhaponticum carthamoides)
Schisandra extract (fruit - Schisandra chinensis)

Increases oxygenation to cells

Golden Root extract (root - Rhodiola rosea)
Niacin (as niacinamide)
Vitamin B-6 (as pyridoxine HCl)
Folic acid
Vitamin B-12 (as cyanocobalamin)

Helps increase and maintain energy levels

Golden Root extract (root - Rhodiola rosea)
Leuzea extract (root - Rhaponticum carthamoides)
Schisandra extract (fruit - Schisandra chinensis)
Niacin (as niacinamide)
Vitamin B-6 (as pyridoxine HCl)
Folic acid
Vitamin B-12 (as cyanocobalamin)

Provides antioxidant activity

Vitamin A (as acetate and beta-carotene)
Vitamin C (as ascorbic acid)
Vitamin E (as acetate)
Golden Root extract (root - Rhodiola rosea)

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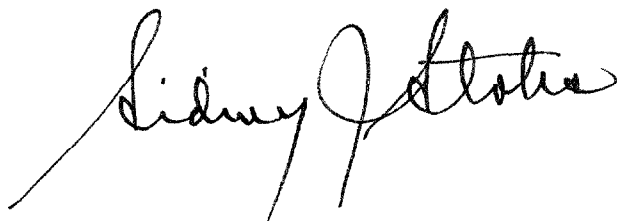
Supports metabolic processes

Vitamin A (as acetate and beta-carotene)
Vitamin C (as ascorbic acid)
Vitamin D (as cholecalciferol)
Vitamin E (as acetate)
Vitamin K (as phylloquinone)
Thiamine (as mononitrate)
Riboflavin
Niacin (as niacinamide)
Vitamin B-6 (as pyridoxine HCl)
Folic acid
Vitamin B-12 (as cyanocobalamin)
Biotin
Pantothenic acid (as calcium pantothenate)

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that AdvoCare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Sidney Stohs". The signature is fluid and cursive, with a long horizontal line extending from the left side of the name.

Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.